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STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY
St. Louis Regional Office
10805 Sunset Office Drive, Suite 100
St. Louis, MO 63127
314-822-0101

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WASTE MANAGEMENT PROGRAM
MISSOURI DEPARTMENT OF
NATURAL RESOURCES

April 11, 1991

Mr. Phillip S. Morris
Roto Die Company
800 Howerton Lane
Eureka, MO 63025

L.D.W. #91-SL.020

Dear Mr. Morris:

Enclosed, please find a report of a hazardous waste management inspection conducted on March 19, 1991, by Mr. Richard Barnes of my staff on Roto Die Company in Eureka, Missouri. Please note that the section titled "UNSATISFACTORY FEATURES" lists violations noted during the inspection and outlines the steps the inspector has determined will correct those violations.

In order to document that corrective actions have been taken, you are requested to submit a written response no later than May 15, 1991. The response should describe the steps taken to correct each of the unsatisfactory features identified. Please direct the response to Mr. Barnes. You should also forward a copy of your response and supporting documentation to Mr. Bruce Martin, Chief - Hazardous Waste Enforcement, Waste Management Program, P.O. Box 176, Jefferson City, MO 65102.

It is our purpose by this letter to persuade you to take all necessary actions to comply with the Missouri Hazardous Waste Management Law. Failure to achieve timely resolution of violations may result in the referral of this case for enforcement action by the Waste Management Program.

Should you have any questions, or wish to confer in this matter, please contact me.

Sincerely,

ST. LOUIS REGIONAL OFFICE

Robert S. P. Eck

Robert S. P. Eck
Regional Administrator

RSPE/RB/pc

Enclosure



R00115012
RCRA RECORDS CENTER

cc: Waste Management Program



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RESOURCE CONSERVATION AND RECOVERY ACT
AND
MISSOURI HAZARDOUS WASTE MANAGEMENT LAW
COMPLIANCE EVALUATION INSPECTION REPORT

Facility

Roto Die Company
800 Howerton Lane
Eureka, MO 63025
(314) 587-3600

EPA ID #: MOD985775147
MO Generator ID: 013468

Participants

Department of Natural Resources

Richard A. Barnes
Environmental Specialist
St. Louis Regional Office

Roto Die Company

Phillip S. Morris

Introduction

An inspection of Roto Die Company, located at the above address, was conducted on March 19, 1991, by Mr. Richard A. Barnes of the Department of Natural Resources. The inspection was conducted under the authority of the Resource Conservation and Recovery Act (RCRA) of 1976 and Sections 260.375(9) and 260.377 of the Missouri Waste Management Law (1977) as amended. The inspection was confined to facets of the operation relevant to hazardous waste management.

The inspection consisted of an opening conference followed by a facility tour. Records were reviewed and a closing conference was held to explain violations observed during the inspection.

Facility Description

Roto Die manufactures rotary cutting tools for the production of pressure sensitive labels. Carbon steel is the primary raw material. Production processes include machining, cutting, grinding and chrome plating.

The facility has 220 employees working three (3) shifts, five (5) days a week. Roto Die has been in operation at this location for nine months.

Roto Die is a large quantity generator of hazardous waste. The hazardous waste-streams generated by the facility include:

1. Waste water soluble cutting fluid, containing Butyl Ether (D001), from the machine shop. Nineteen (19) drums were in storage during the inspection. The generation rate averages less than 90 gallons per month. However, large amounts can be accumulated at one time when recirculation tanks are cleaned out.
2. Machine cutting oil, waste oil and hydraulic oil (D098) generated at various locations in the facility. For disposal, this waste is being handled as D001 listed hazardous waste. Two (2) drums were in storage during the inspection. Generation rate is approximately 800 gallons per month.